IN THE UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

| PATIENT CARE ASSOCIATES LLC a/s/o |) | |
|---|---|--------------------------------|
| R.D., |) | |
| |) | |
| Plaintiff, |) | |
| |) | Civil Action No. 2:13-cv-02904 |
| V. |) | |
| |) | Judge Chesler |
| PROCTER & GAMBLE CO.; ABC CORP. |) | |
| (1-10) (Said names being fictitious and |) | |
| unknown entities), |) | |
| |) | |
| Defendants. |) | |

DECLARATION

I, Donald G. Willis, declare that:

- 1. I am an attorney, an employee of The Procter & Gamble Company, and serve as counsel on matters involving its welfare benefit plans, including The Procter & Gamble Healthcare Plan, which is the Plan that is referred to in the Complaint in this case.
- 2. The attached document is the Summary Plan Description ("SPD"), which also serves as the Plan Document, for The Procter & Gamble Healthcare Plan. This document was in effect at the time the medical services referred to in the Complaint were provided.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 10, 2013

Donald G. Willis